

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT  
EASTERN DIVISION

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WELLY CHANDRA, et al. )  
Plaintiff, ) Lead Case 18-cv-7686  
v. ) Honorable Thomas M. Durkin  
BOEING INTERNATIONAL SALES )  
CORPORATION, a Washington State )  
Profit Corporation, et al. )  
Defendant. )  
\_\_\_\_\_  
)

**RESPONSE TO MOTION BY LIYAHAH AND KOMAR FOR AN ORDER FOR**  
**THEIR FORMER COUNSEL TO PRODUCE CLIENT FILES AND EVIDENCE**  
**OF EXPRESS AUTHORITY TO SETTLE [Docket #870]**  
**BY KEITH GRIFFIN**

Keith Griffin, through his attorney, Ryan D. Saba of Rosen Saba, LLP, submits this response pursuant to this Court's order of December 17, 2020. [Docket #876]. This Response shall solely focus on Mr. Griffin.

1. Paragraph 8 of the Motion for an Order for their Former Counsel to Produce Client Files and Evidence of Express Authority to Settle (the "Motion") states that "Mr. Lira and Mr. Griffin have also declined to clarify if they still have a fee sharing agreement with Girardi Keesee as to the Liyanah and Komar cases or have agreed not to accept any fees or claim to the same from those cases (including transferring any such monies if recovered by their creditors or creditors of Girardi Keesee or Thomas Girardi)." Counsel for Mr. Griffin never received any such request. Nonetheless, this sentence implies that Mr. Griffin had "a fee sharing agreement with Girardi Keesee." There is no such agreement for the Liyanah and Komar cases.

2. Paragraph 9 states “Unlike Respondents, the Edelson firm as been fully responsive to New Counsel’s inquires . . .” Again, counsel for Mr. Griffin has not received any inquires from “New Counsel.”
3. On December 21, 2020, counsel for Mr. Griffin delivered a letter via electronic mail and Federal Express to Peter Lubin of the firm Lubin Austermuehle, P.C. enclosing two documents that were in the possession of Mr. Griffin. A true and correct copy of the letter (without the documents) is attached hereto as Exhibit A.

Respectively submitted,

/s Ryan D. Saba  
Ryan D. Saba  
rsaba@rosensaba.com  
Rosen Saba, LLP  
9350 Wilshire Blvd., Suite 250  
Beverly Hills, California 90212  
(310) 285-1727

**CERTIFICATE OF SERVICE**

I, Ryan Saba, hereby certify that on December 21, 2020, I served a true and correct copy of the foregoing document upon all counsel of record via the Court's CM/ECF System.

/s Ryan D. Saba

